

A Performance Monitoring System that Demonstrates Compliance

1. Performance measurements are properly defined and documented.
2. Data are reported for both CLEC and ILEC operations.
3. Data are reported in a sufficiently detailed and disaggregated manner so that meaningful comparisons can be made.
4. A sound statistical methodology is used to compare the ILEC's performance for CLECs with its performance for its own operations.
5. Adequate auditing and enforcement mechanism are in place to enable other parties to verify the ILEC's data and ensure ongoing compliance.
6. The data show that the ILEC's performance for CLECs is in fact nondiscriminatory.



BellSouth Has Not Demonstrated Compliance

- BellSouth does not have an adequate plan to measure performance in the areas that will reveal whether it is providing nondiscriminatory access and interconnection.
- BellSouth has not provided empirical data to demonstrate that BellSouth's offering of access to resale, UNEs and interconnection actually is nondiscriminatory.



BellSouth's Data Does Not Demonstrate Compliance

- BellSouth has not yet provided data for many measurements in its proposed measurement plan.
 - Average Time to Return Completion Notices
 - Average Time to Return Jeopardy Notices
 - Percentage of Orders Given Jeopardy Notices
 - Number of Service Requests per Order
 - Average Time for Coordinated Customer Conversions
 - Unbundled Network Element Combinations Measurements
 - Collocation Measurements
 - Provisioning Order Accuracy
 - Pre-Ordering Response Times (EC-Lite Interface, Rejections for all interfaces)



BellSouth's Data Does Not Demonstrate Compliance (2)

- BellSouth will not provide comparative data for many measurements.
 - Average Time to Return Completion Notices
 - Average Time to Return Jeopardy Notices
 - Percentage of Orders Given Jeopardy Notices
 - Firm Order Confirmation Timeliness
 - Timeliness of Order Rejections
 - Percent Rejected Service Requests
 - Average Time for Coordinated Customer Conversions
 - Unbundled Network Element Measurements
 - Unbundled Network Element Combinations Measurements
 - Collocation Measurements
 - Provisioning Order Accuracy



BellSouth's Data Does Not Demonstrate Compliance (3)

- For many measurements, the data that BellSouth submits shows that BellSouth's performance for CLECs was substantially worse than its performance for its own operations.
 - Pre-Ordering Response Time
 - Firm Order Confirmation Timeliness
 - Timeliness of Order Rejections
 - Percent Order Flow Through
 - Speed of Answer in Ordering Center
 - Average Order Completion Intervals
 - Percent Missed Installation Appointments
 - Percent Installation Troubles Within 30 Days
 - Provisioning Order Accuracy
 - Percent Out of Service Over 24 Hours
 - Billing Usage Record Timeliness



BellSouth's Measurement Plan is Inadequate

- BellSouth's measurements are not defined properly or adequately.
- BellSouth's measurements are not sufficiently disaggregated to permit meaningful comparisons.
- BellSouth has not presented any methodology for determining what differences between its level of performance for CLECs and its performance for itself represent nondiscriminatory performance. Nor has BellSouth provided the information that would enable others to make that determination in a statistically correct manner.
- BellSouth's performance measurement plan also contains no provision for enforcement.



The Louisiana Public Service Commission Has Recognized the Deficiencies in BellSouth's Performance Measures

- More levels of disaggregation are needed.
- Different statistical methodologies will be evaluated using “real performance measurements”.
- CLECs should be given “reasonable auditing rights” with regard to Bell South’s data.
- Future workshops will be held to discuss enforcement mechanisms, refinements to BellSouth’s performance measurement definitions, and the accessibility of BellSouth’s raw data to CLECs.



BellSouth's Collocation Requirement Prohibits Non-Discriminatory Access

- BellSouth is required to provide access to Unbundled Network Elements at any technically feasible point, not a single point of BellSouth's choosing.
- The terms and conditions of BellSouth's collocation proposal are incomplete and do not demonstrate how access will be non-discriminatory.
- Requiring manual recombination of elements in collocation space creates significant barriers to entry and will gate commercial entry.



BellSouth's Collocation Requirements Will Gate Commercial Entry

- Collocation Requires That Customer's Must Lose Service.
- Delays Associated With Obtaining Collocation Space Will Limit Mass Market Entry By Competitors.
- Collocation Will Limit Number of Customer Cutovers That Can Be Accomplished Because of Purely Manual Processes.
- Collocation Will Redline Customers Provisioned by BellSouth Via IDLC or Remote Switching Equipment.

